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Ogletree Deakins

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

Attorneys At Law

599 Lexington Avenue, 17th Floor New York, NY 10022 Telephone: 212.492.2500

Facsimile: 212.492.2501 www.ogletreedeakins.com

Evan B. Citron 212.492.2068 evan.citron@ogletree.com

December 10, 2021

VIA ECF

The Honorable Allyne R. Ross United States District Judge United States District Court Eastern District of New York 225 Cadman Plaza East New York, NY 11201

Re: Irish v. Majestic GERP LLC et al., 18-CV-307 (JBW-JO)

Dear Judge Ross:

We represent defendants Majestic GERP LLC, Queens GERP LLC, and United Artists Theatre Circuit, Inc. (collectively, "Defendants") in the above-referenced action. On behalf of all parties, and in accordance with Your Honor's Order dated October 12, 2021, we respectfully write to update the Court on the status of the parties' efforts to resolve through private mediation certain outstanding issues related to the Accessibility Remediation set forth in the Stipulation of Remediation. The parties presently anticipate that the mediation will occur before Marc E. Isserles, Esq., in mid-to-late January 2022. In light of the foregoing, the parties respectfully request leave to submit a further status report on February 1, 2022, to update the Court on the mediation before Mr. Isserles.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

Evan B. Citron

cc: All counsel of record (by ECF)